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*Attorney for Debtor*

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re:  
WONG, LOURDES  
Debtor(s),

CASE NO.: BK-S 08-19962 LBR  
IN CHAPTER 13 PROCEEDINGS

**ANSWER TO MOTION FOR  
RELIEF FROM STAY**

Hearing Date: April 27, 2009  
Hearing Time: 9:30 A.M.

COMES NOW, Lourdes Wong, (hereinafter the "Debtor"), by the law firm of PIET & WRIGHT, L.L.C., and attorney Charles T. Wright, Esq., answers the Motion for Relief from Stay of HSBC BANK, USA. NATIONAL ASSOCIATION AS Trustee from the benefit of PEOPLE'S FINANCIAL REALTY MORTGAGE SECURITIES TRUST, Series 2006-1, as follows:

**FIRST DEFENSE**

1. Paragraphs 1 through 3 are admitted. It is also admitted that the liens averred are presently recorded.

4. Paragraph 4 requires no answer.

5. Paragraph 5 is denied.

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1           6. Paragraph 6 requires no answer.

2           7. Paragraphs 7 and 8 are denied.

3           9. Paragraph 9 requires no answer.

4           10. Paragraph 10 requires no answer.

5           11. Paragraphs 11 and 12 are admitted.

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7           WHEREFORE, Debtor prays that the Movant's Motion for Relief from  
8 Automatic Stay be dismissed at Movant's cost.

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10                           **SECOND DEFENSE**

11           Movant is not entitled to the relief it seeks because its lien is subject to  
12 avoidance under 11 U.S.C. §506.

13                           **THIRD DEFENSE**

14           If it is determined that Movant is entitled for relief from the Stay, the Stay  
15 should not be terminated. The Court should grant less drastic relief by conditioning or  
16 modifying the stay.

17  
18                           **FOURTH DEFENSE**

19           Movant's Motion is barred by laches.

20                           **AFFIRMATIVE DEFENSE**

21           Debtor affirmatively states that Movant has brought this action frivolously and  
22 Debtor has incurred additional attorney's fees of approximately \$1,200.00 in connection  
23 with Movant's Motion.  
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1 WHEREFORE, Debtor prays that the Movant is required to pay attorney fees in  
2 connection with this Motion.

3 DATED this 20<sup>th</sup> day of April, 2009.  
4

5 Respectfully submitted,

6 PIET & WRIGHT  
7

8 By: /s/ Charles T. Wright  
9 CHARLES T. WRIGHT, ESQ.  
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13 *Attorney for Debtor*  
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